

WILKERSON & BRYAN

WILKERSON & BRYAN, P.C.  
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET  
MONTGOMERY, ALABAMA 36104  
TEL. 334.265 1500

DANA H BILLINGSLEY

[dana@wilkersonbryan.com](mailto:dana@wilkersonbryan.com)

February 27, 2009

Received & Inspected

MAR 02 2009

FCC Mail Room  
MAILING ADDRESS  
FCC MAIL ROOM  
36101-0830  
FAX 334 265 0319

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission,  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

**Re: Pine Belt Broadcasting, LLC's Annual 47 C.F.R. § 64.2009(e) Customer  
Proprietary Network Information (CPNI) Compliance Certification  
EB Docket No. 06-36**


Dear Ms. Dortch:

On behalf of Pine Belt Broadcasting, LLC (hereinafter, "Pine Belt Broadcasting"), please find attached the annual CPNI Compliance Certification ("Certification") for Pine Belt Broadcasting for the year 2008 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's ("Commission") Electronic Comment Filing System on this date. Simultaneously, Pine Belt Broadcasting has also provided one (1) copy of the Certification to Best Copy and Printing, Inc., via electronic mail at [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM), as required under the Commission's Public Notice, DA 09-9 (released January 7, 2009).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.

  
Dana H. Billingsley  
Attorney for Pine Belt Broadcasting, LLC  
Wilkerson & Bryan, P.C.  
405 South Hull Street  
Montgomery, Alabama 36104  
Telephone: (334) 265-1500  
Facsimile: (334) 265-0319  
Email: [dana@wilkersonbryan.com](mailto:dana@wilkersonbryan.com)

Enclosure

cc: John Nettles  
Best Copy and Printing, Inc.

No. of Copies rec'd 041  
List ABCDE

# ***Pine Belt Broadcasting***

3984 County Road 32  
Arlington, Alabama 36722

Received & Inspected

MAR 02 2009

FCC Mail Room

## **Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

### **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 21, 2009

Name of company covered by this certification: Pine Belt Broadcasting, LLC

Form 499 Filer ID: 821718

Name of signatory: John Nettles

Title of signatory: President

In response to the Federal Communications Commission's ("Commission") Public Notice, DA 09-9 (released January 7, 2009), Pine Belt Broadcasting, LLC states as follows:

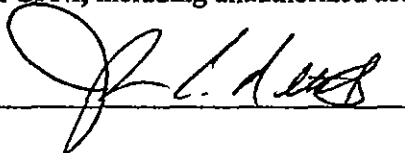
I, John Nettles, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed



# ***Pine Belt Broadcasting***

3984 County Road 32  
Arlington, Alabama 36722

Received & Inspected

MAR 02 2009

FCC Mail Room

Before the  
Federal Communications Commission  
Washington, D.C. 20554

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT  
OF  
PINE BELT BROADCASTING, LLC**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Pine Belt Broadcasting, LLC (hereinafter, "Pine Belt Broadcasting") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001 *et seq.* on behalf of Pine Belt Broadcasting:

1. I have personal knowledge that Pine Belt Broadcasting has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Pine Belt Broadcasting obtains written approval for the use of its customers' CPNI and that Pine Belt Broadcasting has notified its customers of their right to restrict Pine Belt Broadcasting's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Pine Belt Broadcasting has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001 *et seq.* and that Pine Belt Broadcasting has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Pine Belt Broadcasting implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Pine Belt Broadcasting maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what

products and services were offered as part of the campaign. Pine Belt Broadcasting retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Pine Belt Broadcasting has established a supervisory review process regarding Pine Belt Broadcasting's compliance with outbound marketing situations and that Pine Belt Broadcasting maintains records of such compliance for a minimum period of one (1) year. Pine Belt Broadcasting's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

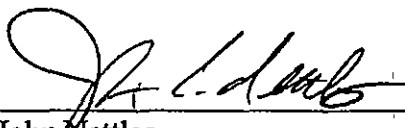
7. I have personal knowledge that Pine Belt Broadcasting has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this 27<sup>th</sup> day of February, 2009.

PINE BELT BROADCASTING, LLC

By:

  
\_\_\_\_\_  
John Nettles  
President